

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Case No. 1:03-md-01570-GBD-SN

This document relates to:

ORAL ARGUMENT REQUESTED

Ashton, et al. v. Al Qaeda, et al., No. 02-cv-6977; *Federal Ins. Co., et al. v. Al Qaida, et al.*, No. 03-cv-6978; *Burnett, et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849; *Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922; *Continental Casualty Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-5970; *O'Neill, et al. v. Republic of the Sudan, et al.*, No. 18-cv-12114; *Aronow, et al. v. Republic of Sudan*, No. 20-cv-07733; *Betru, et al. v. The Republic of Sudan*, No. 20-cv-10615; *Parker, et al. v. The Republic of the Sudan*, No. 20-cv-10657; and *Nolan, et al. v. The Republic of the Sudan*, No. 20-cv-10720.

**SUDAN'S NOTICE OF ITS CONSOLIDATED MOTION TO DISMISS
THE AMENDED COMPLAINTS FOR LACK OF SUBJECT-MATTER JURISDICTION,
LACK OF PERSONAL JURISDICTION, AND FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that, pursuant to Rules 7(b), 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, the Republic of the Sudan ("Sudan"), by and through undersigned counsel, hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against Sudan in the Amended Complaints (ECF Nos. 6537, 6539) for lack of subject-

matter jurisdiction, as the Amended Complaints fail to allege sufficient facts that would bring these actions within the exceptions to foreign sovereign immunity set forth in 28 U.S.C. §§ 1605(a)(5), 1605(a)(7), 1605A, and 1605B. Sudan further moves for dismissal of the Amended Complaints for lack of personal jurisdiction and failure to state a claim. A memorandum of law in support of this Motion is filed herewith.

Dated: January 8, 2021
Washington, DC

Respectfully submitted,

WHITE & CASE

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